IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

CHARLES GRIGSON, LISA HOING, and DAVID KELLY, Individually and on behalf	§ §	
of all putative class members,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 1:17-cv-00088-LY
	§	CIVII ACUOII NO. 1.17-CV-00086-L I
FARMERS GROUP, INC.,	§	
a Nevada corporation,	§	
	§	
Defendant.	§	
	§	
	§	

PLAINTIFFS' RESPONSE TO MICHAEL J. WOODS'S PLEA IN INTERVENTION

COME NOW, Plaintiffs Charles Grigson, Lisa Hoing, and David Kelly ("Plaintiffs"), who file this Response to the Michael J. Woods's Plea in Intervention that was filed *pro se* with the Court on July 3, 2019. (Dkt. No. 136.)

Based on a review of Mr. Woods's filing, it appears that he is not seeking to formally "intervene" as that term is used in Federal Rule of Civil Procedure 24, but rather wishes that his voice be heard in requesting the Court "certify a Class (or Classes) to protect all FA2 policyholders" which would include Mr. Woods. (Dkt. No. 136, at 9.) Intervention is not required under Rule 24 to participate in this case as a class member.

Accordingly, Plaintiffs suggest that the Court at this time deny Mr. Woods's "intervention" to the extent his pleading seeks formal intervention in the case pursuant to Rule 24, and instead construe Mr. Woods's pleading as an amicus in support of class certification in the case.

Respectfully submitted,

/s/ John R. Davis

Dated: July 10, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record. In addition, I hereby certify that I will perfect consented-to email service upon Mr. Woods *pro se* on July 10, 2019.